

REMARKS

Claims 1-35 were previously pending in this patent application. Claims 1-35 stand rejected. Herein, Claims 1, 9, 10, 18, 19, 27, 28 and 35 have been amended. Support for the amendments is found in pages 30-36 of the Specification and Figures 8-10. Accordingly, after this Amendment and Response, Claims 1-35 remain pending in this patent application. Further examination and reconsideration in view of the claims, remarks, and arguments set forth below is respectfully requested.

35 U.S.C. Sections 112, First Paragraph and Second Paragraph, Rejections

Independent Claims 1, 10, 19, and 28 have been amended to remove the limitation that caused the rejections under 35 U.S.C. Sections 112, First Paragraph and Second Paragraph. Therefore, these rejections are moot.

35 U.S.C. Section 102(e) Rejections

Claims 1-35 stand rejected under 35 U.S.C. 102(e) as being anticipated by Vaithilingam et al., U.S. Patent No. 6,411,724 (hereafter Vait). These rejections are respectfully traversed.

Independent Claim 1 recites (as amended):

“A method of forming a semantic description for content data, comprising the steps of:

- a) **storing** a plurality of component semantic descriptions **in a distributed manner and remotely from said content data** and **retrieving** one or more of said plurality of component semantic descriptions, wherein said retrieving is performed according to reference information associated with said content data; and
- b) generating said semantic description for said content data using said one or more component semantic descriptions and said reference information associated with said content data, wherein said semantic description describes an underlying meaning of said content data rather than what is in said content data, and wherein said reference information includes one of location of said component semantic descriptions, identity of said component semantic descriptions needed to create said semantic description, and manner of processing said component semantic descriptions to create said semantic description." (emphasis added)

It is respectfully asserted that Vait does not disclose the present invention as recited in Independent Claim 1. In particular, Independent Claim 1 recites the limitation, "**storing** a plurality of component semantic descriptions **in a distributed manner and remotely from said content data** and **retrieving** one or more of said plurality of component semantic descriptions," (emphasis added). In the Office Action, it appears that the elements "descriptor" and "meta-descriptor" of Vait are identified as the "component semantic descriptions" recited in Independent Claim 1. Vait discloses that multimedia data (or "content data") such images, video, music, speech, and sound instead of descriptors and meta-descriptors (both which are identified as component semantic descriptions in the Office Action) may be stored in one place or distributed throughout the world. [Vait; Col. 3, lines 20-29]. Additionally, Vait states that preferably, at least the meta-descriptors and their attachment data are stored in storage (120) of Figure 2, which may be any type of database. [Vait; Figure 2; Col. 7, lines 47-56]. That is, the meta-descriptors (which are identified as component semantic descriptions in the Office Action) are stored in one place (e.g., storage (120))

instead of being stored in a distributed manner, as in the invention of Independent Claim 1. Moreover, Vait distinguishes between storing in one place (e.g., storage (120)) and storing in a distributed matter (e.g., distributed throughout the world or distributed on the Internet). [Vait; Figure 2; Col. 3, lines 20-29; Col. 7, lines 47-56].

Further, Vait notes that descriptors may be stored in the storage (120) of Figure 2 or stored with the multimedia information (or "content data") from which they were extracted, wherein the multimedia information itself resides in a repository which may be as specific as other memory space in the storage device (120) or as diverse as the Internet. [Vait; Figure 2; Col. 7, lines 47-56]. That is, the descriptors (which are identified as component semantic descriptions in the Office Action) are stored in one place (e.g., storage (120)) instead of being stored in a distributed manner or are stored with the multimedia information (or "content data") instead of being stored remotely from the multimedia information (or "content data"), as in the invention of Independent Claim 1.

As discussed above, Vait does not disclose the cited claim limitation of Independent Claim 1. Therefore, it is respectfully submitted that Independent Claim 1 is not anticipated by Vait and is in condition for allowance.

Dependent Claims 2-9 are dependent on allowable Independent Claim 1, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 2-9 are patentable over Vait for the reasons discussed above.

With respect to Independent Claims 10, 19, and 28, it is respectfully submitted that Independent Claims 10, 19, and 28 recite similar limitations as in Independent Claim 1. In particular, Independent Claim 10 recites the limitation, “**storing** a plurality of component semantic descriptions **in a distributed manner and remotely from said content data** and **retrieving** one or more of said plurality of component semantic descriptions,” (emphasis added). Further, Independent Claim 19 is directed to a semantic description for content data and recites the claim limitation, “one or more component semantic descriptions which are retrieved from a plurality of component semantic descriptions **stored in a distributed manner and remotely from said content data**” (emphasis added). Furthermore, Independent Claim 28 recites the limitation, “**storing** a plurality of component semantic descriptions **in a distributed manner and remotely from said content data** and **retrieving** one or more of said plurality of component semantic descriptions,” (emphasis added). As discussed above, Vait fails to disclose the cited limitations of Independent Claims 10, 19, and 28. Therefore, Independent Claims 10, 19, and 28 are allowable over Vait for reasons discussed in connection with Independent Claim 1.

Dependent Claims 11-18, Dependent Claims 20-27, and Dependent Claims 29-35 are dependent on allowable Independent Claims 10, 19, and 28 respectively, which are allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 11-18, Dependent Claims 20-27, and Dependent Claims 29-35 are patentable over Vait for the reasons discussed above.

CONCLUSION

It is respectfully submitted that the above claims, arguments and remarks overcome all rejections and objections. All remaining claims (Claims 1-35) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 1-35) are in condition for allowance.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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